

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

JASON KESSLER)
)
Plaintiff,)
)
v.) Case No. 3:18cv00015-NKM-JCH
)
CITY OF CHARLOTTESVILLE) MOTION FOR ENTRY OF
MAURICE JONES) PROTECTIVE ORDER
Charlottesville City Manager)
In his individual and official capacities)
)
Defendants.)

Defendants the City of Charlottesville and Maurice Jones hereby move pursuant to Rule 26(c) of the Federal Rules of Civil Procedure for entry of the attached protective order limiting the disclosure of discovered information in appropriate circumstances.

The proposed order follows a form that has been used successfully by Defendants' counsel in many cases, and also uses as reference an order agreed to by Plaintiff Kessler and his counsel in another pending case before this Court, *Sines v. Kessler*, No. 3:17cv00072, entered by Judge Hoppe on Jan. 3, 2018.

A copy of the proposed order was sent to Plaintiff's counsel for approval and stipulation on June 20, 2018. Several follow-up requests were made for agreement to the form, none of which has been responded to. The most recent request was today, and plaintiff's counsel was advised that the order would be filed today for approval. There was again no response.

Wherefore, Defendants respectfully request that the court enter the attached protective order to govern the exchange of information in this case.

DATED: July 2, 2018

/s/ Linda Odom

Linda Odom (VSB No. 77149)
John Longstreth (*pro hac vice*)
Daniel S. Cohen (VSB No. 92163)
K&L Gates LLP
1601 K St. NW
Washington, D.C. 20006
Tel: (202) 778-9000
Fax: (202) 778-9100
E-mail: linda.odom@klgates.com
john.longstreth@klgates.com
dan.cohen@klgates.com

Lisa A. Robertson
Chief Deputy/Acting City Attorney (VSB No. 32486)
Sebastian Waisman (VSB No. 91665)
Office of the City Attorney
P.O. Box 911
Charlottesville, VA 22902
Tel: (434) 970-3131
Fax: (434) 970-3022
E-mail: robertsonl@charlottesville.org
waismans@charlottesville.org

Counsel for Defendant